

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	19-03600
Paris Morales)		
)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **April 8, 2021 at 1:30 p.m.**, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Dale Riley

Dale Riley
Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
312.332.1800
ndil@geracilaw.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	19-03600
Paris Morales)		
)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the listed parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 3/18/2021.

LIST OF PARTIES SERVED

Marilyn O. Marshall, 224 S. Michigan Ave. #800 , Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Paris Morales, 4919 N. Kentucky Ave. #2, Chicago, IL 60630

ALL CREDITORS ON THE ATTACHED LIST

Alliant Credit Union
Attn: Bankruptcy Dept.
11545 W Touhy Ave
Chicago IL 60666

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

ALLY Financial
Attn: Bankruptcy Dept.
200 Renaissance Ctr
Detroit MI 48243

CreditBox
2400 Devon Av Suite 210
Des Plaines IL 60018

AMEX
Attn: Bankruptcy Dept.
Po Box 297871
Fort Lauderdale FL 33329

Estefania Escobar
4919 N. Kentucky Ave.
Chicago IL 60630

Barbara Delgado
4919 N. Kentucky Ave.
Chicago IL 60630

Lasik Plus
939 W North Ave Suite 220
Chicago IL 60642

Barclays BANK Delaware
Attn: Bankruptcy Dept.
Po Box 8803
Wilmington DE 19899

Mcydsnb
Attn: Bankruptcy Dept.
Po Box 8218
Mason OH 45040

BEST BUY/CBNA
Attn: Bankruptcy Dept.
50 Northwest Point Road
Elk Grove Village IL 60007

NET Credit
Attn: Bankruptcy Dept.
200 W Jackson Blvd Ste 2
Chicago IL 60606

Caliber HOME Loans, IN
Attn: Bankruptcy Dept.
13801 Wireless Way
Oklahoma City OK 73134

TBOM/ATLS/FORTIVA THD
Attn: Bankruptcy Dept.
Po Box 10555
Atlanta GA 30310

CAP1/Bstby
Attn: Bankruptcy Dept.
26525 N Riverwoods Blvd
Mettawa IL 60045

TBOM/Milestone
Attn: Bankruptcy Dept.
Po Box 4499
Beaverton OR 97076

Capital ONE BANK USA N
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond VA 23238

US Bank NA
Bankruptcy/Recovery Dept.
PO Box 5229
Cincinnati OH 45201

Capital ONE BANK USA N
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond VA 23238

Codilis & Associates, PC
Bankruptcy Dept.
15W030 N. Frontage Rd. #100
Burr Ridge IL 60527

Citicards CBNA
Attn: Bankruptcy Dept.
Po Box 6241
Sioux Falls SD 57117

USAA Savings BANK
Attn: Bankruptcy Dept.
Po Box 47504
San Antonio TX 78265

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re: Paris Morales Debtor)))))	Case No: 19-03600 Chapter: Chapter 13 Judge: Timothy A. Barnes
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MOTION TO MODIFY CONFIRMED PLAN

NOW COMES the Debtor, Mr. Paris Morales (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 02/12/2019.
3. The Debtor’s plan was confirmed by the Court on 04/04/2019 and has monthly plan payments of \$1,490 and a 100% dividend to unsecured claims.
4. The Debtor fell behind on his Chapter 13 payments because he lost his job.
5. The Debtor is now receiving unemployment benefits and as such can now afford monthly plan payments of no greater than \$950 which is sufficient to pay unsecured creditors a dividend of 45%.
6. The Debtor has resumed plan payments but is unable to cure the default.
7. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to reduce the monthly plan payment to \$950, to reduce the dividend to unsecured claims to 45%, to extend the plan term to 84 months under 11 U.S.C. 1329(d) as allowed by the CARES Act, to defer the arrears to the end of the plan term, and to require the Debtor to turn his federal tax refunds in excess of \$1,200 over to the Trustee beginning with his 2020 refund.

WHEREFORE THE DEBTOR, Mr. Paris Morales, respectfully requests this Honorable Court enter an order:

1. Reducing the monthly plan payment to \$950.
2. Reducing the dividend to unsecured claims to 45%.
3. Extending the plan term to 84 months.
4. Deferring arrears to the end of the plan term.
5. Requiring the Debtor to turn his federal tax refunds in excess of \$1,200 over to the Trustee as additional payments into the plan.
6. Any other relief the court deems proper.

By: /s/ Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960